

Additional Response # 6

“...it is stated that waste materials were transported only one time during the week of November 12, 2007 from the Baylis facility to the Pulaski facility...”

- a. The “one drum” statement above, which was reported, is incorrect.
There were 10 drums transported from the Baylis facility to the Pulaski facility.

Note: When preparing the Response to Question 18 of the February 4, 2008 Questions, I interviewed three people to verify how many drums were transported from Baylis to Pulaski. All three reported to me that only one drum was transported. One of the individuals, whom I had believed to be in charge of the recycling and the vans reported to me that he was sure that only one drum was transported. I did not validate any of the claims.

The 10 drum amount stated above was determined as follows:

1. Interviewing all individuals who drove the van and drove the forklift at Baylis. The interviews included contacting 3 former employees.
2. Calculations made from purchase statements, determining evaporation & usage rate, one manifest, and inventory on hand.
3. Comparing and corroborating data from #1 and #2 above.

The Exhibits and Attachments below provide the details.

- b. We have generated approximately 41 gallons per month of dirty MEK since September 2006. The calculations are below:

1. September 2006 – 1 drum, 1month(+)
On September 26, 2006, we shipped 6 drums of spent MEK.
Attachment 6a contains a copy of the manifest.
These drums had accumulated for seven months since the prior shipment/manifest on March 23, 2006.
 $7 \text{ months} / 6 \text{ drums} = .86 \text{ drums per month.}$
2. October 2006 to October 2007 – 10 drums, 12 months
The 10 drum amount is taken from the Exhibit 1 calculation below.
3. October 2007 to March 2008 – 3 drums, 6 months (1)
4. Total accumulation from #1, 2, 3 above is 14 drums in 19 months
 $14 \text{ drums} / 19 \text{ months} = .74 \text{ drums per month}$
 $.74 \text{ drums} = 41 \text{ gallons per month}$

- c. Only 1 drum was hauled and disposed.
Attachment 6a contains the manifest from September 26, 2006.
No other drums were disposed, as follows:
10 drums were hauled to Pulaski and recycled.
3 drums are at Baylis.

Additional Response # 6

Exhibit 1

Reconciliation of Drums Hauled from Baylis to Pulaski

<u>Drums</u>		
Total	21	Drums purchased since 09/06 (See Attachment 6b)
Minus	<u>1</u>	Drum Hauled 09/26/06 (See Attachment 6a)
	20	
Minus	<u>10</u>	Drums reported as hauled from Baylis to Pulaski
	10	
Minus	<u>3</u>	Dirty MEK drums at Baylis on 4/22/08 (1)
	7	
Minus	<u>1</u>	Drum in use at Baylis on 4/22/08 (2)
	6	Drums used or evaporated

(1) These drums were not transported to the Pulaski as verbally directed in the December 11, 2007 EPA Inspection Meeting. They first drum was generated on October 25, 2007. All of the drums are scheduled to be shipped as hazardous waste in May 2008. They will continue to be shipped as hazardous waste until and unless the verbal directive is reversed by the EPA.

(2) The 6 drum (30%) used or evaporated is consistent with a recent study we performed. In the study we found that 33% of the MEK is evaporated or used. (See Attachment 6c)

Attachment 69
USOE

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number ADD0063215453	2. Page 1 of 1	3. Emergency Response Phone (800) 392-1503	4. Manifest Tracking Number 000015089 FLE	
5. Generator's Name and Mailing Address Waste Management, Inc. 1234 South Main Street Baltimore, MD 21201 Generator's Phone: (410) 555-1234		Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name Waste Management, Inc.		U.S. EPA ID Number 01H00000000543				
7. Transporter 2 Company Name		U.S. EPA ID Number				
8. Designated Facility Name and Site Address Waste Management, Inc. 1234 South Main Street Baltimore, MD 21201 Facility's Phone: (410) 555-1234		U.S. EPA ID Number 01H00000000543				
9a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	No.	Type				
	1. 215 Waste Material (ethylene glycol) - 1000 Lbs. (2000 Lbs.)	--6	DM	330	G	000000051005
	2. 215 Waste Material (ethylene glycol) - 1000 Lbs. (2000 Lbs.)	--2	DF	150	P	0007
	3.					
4.						
14. Special Handling Instructions and Additional Information Waste Management, Inc. 60-55511-215 (ethylene glycol) - 1000 Lbs. (2000 Lbs.) Waste Management, Inc. 60-55511-215 (ethylene glycol) - 1000 Lbs. (2000 Lbs.)						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or 301 (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name FRANK LENTH		Signature [Signature]		Month Day Year 9 26 06		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Gene Watkins		Signature [Signature]		Month Day Year 9 26 06		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number: _____						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. 11161		2. 11141		3. 4.		
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name [Signature]		Signature [Signature]		Month Day Year 10/16/06		

BAYLIS MEK PURCHASES
September 2006 - March 2007

Order #	Order Date	Ship Date	PO#	Purch Price		Summary	
						Month	Qty
327726	02/13/08	02/14/08	7163	432.9		Feb 07	1
321403	11/13/07	11/14/07	6949	432.9		Nov 07	1
319894	10/24/07	10/25/07	6894	432.9		Oct 07	1
317955	09/27/07	09/28/07	6806	432.9		Sep 07	2
316368	09/06/07	09/07/07	6737	432.9			
313874	08/01/07	08/03/07	6644	432.9		Aug 07	1
311099	06/25/07	06/26/07	6529	432.9		Jun 07	1
309434	05/31/07	06/01/07	6482	432.9		May 07	1
306203	04/16/07	04/17/07	6361	432.9		Apr 07	2
305474	04/05/07	04/09/07	6318	432.9			
304261	03/21/07	03/22/07	6273	432.9		Mar 07	2
303428	03/08/07	03/09/07	6246	432.9			
301845	02/13/07	02/14/07	6173	432.9		Feb 07	2
300942	02/01/07	02/02/07	6133	432.9			
299217	01/09/07	01/10/07	6052	432.9		Jan 07	1
298237	12/21/06	12/22/06	6017	432.9		Dec 06	2
297012	12/04/06	12/05/06	5969	432.9			
295863	11/16/06	11/17/06	5934	432.9		Nov 06	2
295120	11/06/06	11/07/06	5906	432.9			
292505	09/28/06	09/29/06	5800	432.9	Sept 06	2	
291039	09/08/06	09/11/06	5736	432.9			
Total MEK Drums purchased Sep 06 - Mar 07							21

Notes:

- 1) Data taken from Tilley Chemical Purchasing Log.
- 2) Tilley Chemical is our only MEK Supplier.
- 3) \$432.90 is the purchase price for 1 drum.

YAHOO! MAIL

Print - Close Window

Date: Mon, 21 Apr 2008 07:11:23 -0700 (PDT)
From: "Karen Keffer" <ep_pulaski2@yahoo.com>
Subject: MEK Usage/Evaporation
To: "Michael Castor" <easternplating@yahoo.com>

Michael

We have completed the Evaporation/Usage Test

On Tuesday 4/15/08 at 4:00 We measured 7 gallons of MEK and put it in the "Clean MEK Tank". For 3 days did not add any additional MEK for testing reasons. This tank is the final tank the parts are put in before removing them.

On Friday 4/18/08 at 2:30 we removed the MEK from this tank to measure it it. There was about 4 1/4 gallons remaining.

Through usage and evaporation in 72 hours a little more then 1/3 of the tank was used. This would be MEK that would not be available for recycling.

Thanks Karen

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. [Try it now.](#)

Additional Response # 7

Based on review of manifests....approximately 110 – 330 gallons of “dirty” MEK were shipped off-site from Baylis facility approximately every three months.

- a. In preparing this additional response I was unable to locate my work papers used to determine the amount previously reported.

The 5 – 10 gallons per month was misstated.

I believe the original calculation determined the amount to be 5 – 10 gallons per week. This amount was not converted to the amount per month when reported.

The calculation per week was made using the Baylis manifests for 2006 and 2005.

- b. The 5 – 10 gallons per month is inaccurate.
The 5 – 10 gallons per week converts to 22 – 43 gallons per month, using 4.3 weeks/month.

In re-reviewing the manifests for 2006 and 2005, the weekly amount is 8.6 – 12.8 gallons per week and calculates to 37 – 55 gallons per month. (See below – Exhibit 1).

I believe that I double counted the month ending quarter and the month beginning quarter. The “Double Count” columns in Exhibit 1 explain this.

Exhibit 1 Baylis Dirty MEK Accumulation from Manifests

Year/Month	Drums	Months	Avg/Mon(1)	---w/Double Count---	
				Drums	Avg/Mon(2)
2005					
Mar – Jun	2	3	.67	4	.5
Jun – Sep	3	3	1	4	.75
Sep – Dec	3	3	1	4	.75
2006					
Dec – Mar	3	3	1	4	.75
Mar – Oct	6	7	.86	8	.75

- 1) This calculates to 8.5 – 12.8 gallons per week or 37 – 55 gallons per month.
2) This calculates to 6.4 – 9.9 gallons per week or 28 – 42 gallons per month.

Additional Response # 8

Please identify the remaining container....

The remaining container was 1 drum of chromic acid anodize solution.

The reported amount of 2 drums caustic etch solution was actually 1 drum of caustic etch solution and 1 overpack of caustic etch sludge.

Specifically, there were

5 drums chromic acid anodize solution

4 drums chromic rinse water

1 drum caustic etch

1 overpack caustic etch sludge

Additional Response # 9

“...near the electric meters and anodizing tank, the inspector observed three drums labeled “Chromic Rinse”, “Chromic” and “Rinse Chromic”...”

- a. The statement “five containers said to contain chromic rinse” is inaccurate. There were four drums containing chromic acid rinse.

All of the drums are accounted for, as follows:

4 drums chromic acid rinse were shipped March 14, 2008.

Attachment 9A contains the manifest.

5 drums of chromic anodize solution were relocated adjacent to the tank.

1 of the 5 drums contained 22 gallons. The contents of this drum was added to bath.

Attachment 9B contains the add slips.

Attachment 9C contains a photo of the 4 remaining drums.

1 drum of the caustic etch is in the waste treatment area

Attachment 9D contains a photo of the drum

1 drum of the caustic etch sludge was shipped on April 3, 2008

Attachment 9E contains the manifest.

- b. Only 2 drums of chromic rinse water were generated on December 7, 2007. These drums were used to clean the tank after transferring the solution from the smaller chromic acid anodizing tank to the larger chromic acid anodizing.
- Attachment 9F contains the lab report for the change in tank.
- Attachment 9G contains the outside lab report for the contents of the drum.
- The reconciliation for the remaining 2 drums is explained in response “c” below.
- c. The original information reported to me of the 4 drums generated on December 7, 2007 was incorrect.

The drum labeled 10/30/07 was generated on that date.

A leak in the water cooling coil in tank, which discharges into the rinse tank, caused a small amount the chromic acid anodize solution to leak into the rinse tank.

The tending operator reported to me on 4/24/08 there was no measurable change in the solution level. (A ¼ inch change would have resulted in a 1.6 gallon leak.)

55 gallons of the rinse tank were transferred to the drum.

Attachment 9H contains the outside lab report for the contents of this drum or the drum reported below for 11/11/07.

The drum labeled 11/11/07 was generated on that date.

A leak in a second water coiling coil in the tank caused a small amount of the chromic acid anodize solution to leak into the rinse tank.

The tending operator reported to me on 4/24/08 there was no measurable change in the solution level. He reported this leak was a smaller amount than the leak on 10/30/07.

55 gallons of the rinse tank were transferred to the drum.

Attachment 9H contains the outside lab report for the contents of this or the drum reported above for 10/30/07.

Additional Response # 9

Note – I was aware of these two events at the time of occurrence.

When preparing the response to Question 9 of the February 4, 2008 Information Request, the information regarding the 4 drums dated December 7 was given to me. I questioned the validity of the 4 drums generated that date. The answer given to me appeared to be valid. I did not question the answer nor did I question the events above relating to the response.

- d. The contents of the chromic rinse drums were shipped on March 14, 2008.

Attachment 9A 43245

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MDD063215453		2. Page 1 of 1		3. Emergency Response Phone 410-978-1093		4. Manifest Tracking Number 001585039 FLE			
5. Generator's Name and Mailing Address Eastern Plating Co. 1200 South Baylis Street, Baltimore, MD 21224 Generator's Phone: 410-342-4107								Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Envirite of Pennsylvania, Inc								U.S. EPA ID Number PAD010154045			
7. Transporter 2 Company Name								U.S. EPA ID Number			
8. Designated Facility Name and Site Address Envirite of Pennsylvania, Inc 730 Vogelsong Road, York, PA 17404 Facility's Phone: 717-846-1900								U.S. EPA ID Number PAD010154045			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	RQ. Waste chromic acid solution, 8, UN1755, III (D002, D005, D007, D008)				No. 4	Type DIF	220	G	D002	D005
										D007	D008
14. Special Handling Instructions and Additional Information ERG# 154 V.C. # 018583 Y#3245											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Officer's Printed/Typed Name Wellington Abhilashi											
Signature Abhilashi											
Month Day Year 10 3 14 08											
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:										
	17. Transporter Acknowledgment of Receipt of Materials										
Transporter 1 Printed/Typed Name John J. Grosik											
Signature John J. Grosik											
Month Day Year 10 3 14 08											
Transporter 2 Printed/Typed Name											
Signature											
Month Day Year											
DESIGNATED FACILITY	18. Discrepancy										
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 1,800 LBS.										
	Manifest Reference Number:										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number										
	Facility's Phone:										
18c. Signature of Alternate Facility (or Generator) Month Day Year											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. H077 2. 3. 4.											
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18											
Printed/Typed Name KIRBY E. NEWSON											
Signature Kirby E. Newson											
Month Day Year 10 3 14 08											

QUICK ADD

Add ---⁵--- Gal. Good Chromic Acid solution from the
55 gal drum, in B1-15 Chromic Anodize tank.

Chemist.
Wellington.

Date: 03/05/08

Operator Name: George Martinez
Date: 03-05-08

QUICK ADD

Add ~~---~~¹⁰~~---~~ Gal. Good Chromic Acid solution from the
55 gal drum, in B1-15 Chromic Anodize tank.

Chemist.

Wellington.

Date: 03/18/08

Operator Name: George Martinez

Date: 03-18-08

QUICK ADD

Add ⁷----- Gal. Good Chromic Acid solution from the
55 gal drum, in B1-15 Chromic Anodize tank.

Chemist.
Wellington.

Date: 04/04/08

Operator Name: George Martinez

Date: 04-04-08

Attachment 9C



Attachment: qd.



50% CAUSTIC SODA Solution
HEALTH HAZARD
DANGER CAUSTIC

50% CAUSTIC SODA Solution
HEALTH HAZARD
DANGER CAUSTIC

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MD0063215453	2. Page 1 of 1	3. Emergency Response Phone (800) 342-1503	4. Manifest Tracking Number 001409858 FLE			
		5. Generator's Name and Mailing Address Eastern Plating Company 1200 South Baylis Street Baltimore, MD 21224 Generator's Phone: (410) 342-4107						
6. Transporter 1 Company Name Midwest Environmental Transport, Inc						U.S. EPA ID Number OH0000000539		
7. Transporter 2 Company Name						U.S. EPA ID Number		
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232 Facility's Phone: (513) 541-1823						U.S. EPA ID Number OH0083377010		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. RD; Hazardous Waste Solid, n.o.s. (Chromium, Nickel) 2. NA 3077, PG III, (D007)		6 DF		100	P	D007
		2. CORROSIVE LIQUID N.O.S. (SODIUM HYDROXIDE) & UN1751 PG II (RLP)		1 DF		600	P	
	RO	3. WASTE CORROSIVE LIQUID N.O.S. (NICKEL HYDROXIDE ALUMINUM HYDROXIDE) & UN1760 PG II		1 DF		55	G	D002
		4.						
14. Special Handling Instructions and Additional Information 1. X95257 6 x55 ERG # 171 3. X95261 1 x55 ERG # 154 2. X95260 1 x55 ERG # 154								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Officer's Printed/Typed Name WELLINGTON ADAMS Signature <i>[Signature]</i> Month Day Year 04 03 00								
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____							
	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name Robert P. Wright				Signature <i>[Signature]</i>		Month Day Year 04 03 00	
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	Manifest Reference Number: _____							
	18b. Alternate Facility (or Generator)						U.S. EPA ID Number	
	Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year								
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. _____		2. _____		3. _____		4. _____		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name _____				Signature _____		Month Day Year		


EASTERN PLATING COMPANY, INC
QUALITY ASSURANCE RECORD

 PROCESS SOLUTION CONTROL
 CHEMICAL ADDITION REQUEST

Document #QAR-4600B:B-Report

Release Level I

Release Date: 10 March 2007

Date of Request: _____

Lab Tech: _____

Reviewed By: Willie

Sign and RETURN TO CHEMIST when complete

TANK	TANK DATA				PARAMETER CONTROLLED	ACCEPTABLE RANGE		CURRENT CONDITIONS			ADD DATA			COMPLETION	
	TK#	GAL. CAP.	NEW TK MU	UNITS		LOW	HIGH	VALUE	UNITS	O/U SPEC	CHEMICAL TO BE ADDED	ADD QTY	UNITS	OPERATOR	DATE
Chromic Anodize	B1-15	286	100	Lbs.	Free Chromic Acid	42	54	49.0	G/L		Free Chromic Acid		Lbs.		
					Total Chromic Acid		100	50.3	G/L		Total Chromic Acid				
					Temperature	90	100	98	°F		Temperature				
					Specific Gravity	1.042		1.0	Sp. Gr.		Specific Gravity				
				Gal.	Surface Tension		45	33.1			Fumetrol 140		Gal.		
Gold Chromate	B1-07	613	56	Lbs.	Iridite 14-2	1.25	2.25	1.7	Oz/Gal		Iridite 14-2		Lbs.		
					pH	1.1	1.8	1.8	pH		pH				
					Temperature	70	90	80	°F		Temperature				
Clear Chromate	B1-09	602	40	Gal	Chromicoat CLR	6	8	7.3	%V/V		Chromicoat CLR		Gal		
					pH	2.3	2.5	2.5	pH		pH				
					Temperature	75	85	75	°F		Temperature				
SurTec 650 Chrom	B1-40	123	37	Gal	Chromital TCP SurTec 650	28	32	31.6	%V/V		Chromital TCP SurTec 650		Gal		
					pH	3.8	4	4.0	pH		pH		Gal		
					Temperature	90	100	96	°F		Temperature				
Dichromate Seal	B1-15C	154	50	Lbs.	Sodium Dichromate	4.5	6	6.5	%W/V		Sodium Dichromate		Lbs.		
					pH	5	6	5.0	pH		pH				
					Temperature	195	205	not on	°F		Temperature				

Adds Must Be Made to Tanks Below Lower Spec Limit Before Further Use
 Adds are to be made within two working days from date of request

C&A - CHECK AND ADJUST
 QAR-4600B.xls
 Page 3 of 5



EASTERN PLATING COMPANY, INC QUALITY ASSURANCE RECORD

PROCESS SOLUTION CONTROL
CHEMICAL ADDITION REQUEST

Document #QAR-4600B:B-Report

Release Level I

Release Date: 10 March 2007

Date of Request: _____

Lab Tech: _____

Reviewed By: Willie

Sign and RETURN TO CHEMIST when complete

TANK DATA					PARAMETER CONTROLLED	ACCEPTABLE RANGE		CURRENT CONDITIONS			ADD DATA			COMPLETION	
TANK	TK#	GAL. CAP.	NEW TK MU	UNITS		LOW	HIGH	VALUE	UNITS	O/U SPEC	CHEMICAL TO BE ADDED	ADD QTY	UNITS	OPERATOR	DATE
Chromic Anodize	B1-15	286	100	Lbs.	Free Chromic Acid	42	54	49.0	G/L		Free Chromic Acid		Lbs.		
		563	200		Total Chromic Acid		100	50.9	G/L		Total Chromic Acid				
					Temperature	90	100	99	°F		Temperature				
					Specific Gravity	1.042		1.0	Sp. Gr.		Specific Gravity				
				Gal.	Surface Tension		45	33.1			Fumetrol 140		Gal.		
Gold Chromate	B1-07	613	56	Lbs.	Iridite 14-2	1.25	2.25	1.7	Oz/Gal		Iridite 14-2		Lbs.		
					pH	1.1	1.8	1.8	pH		pH				
					Temperature	70	90	80	°F		Temperature				
Clear Chromate	B1-09	602	40	Gal	Chromicoat CLR	6	8	6.8	%V/V		Chromicoat CLR		Gal		
					pH	2.3	2.5	2.5	pH		pH				
					Temperature	75	85	75	°F		Temperature				
SurTec 650 Chrom	B1-40	123	37	Gal	Chromital TCP SurTec 650	28	32	29.4	%V/V		Chromital TCP SurTec 650		Gal		
					pH	3.8	4	4.0	pH		pH		Gal		
					Temperature	90	100	95	°F		Temperature				
Dichromate Seal	B1-15C	154	50	Lbs.	Sodium Dichromate	4.5	6	5.7	%W/V		Sodium Dichromate		Lbs.		
					pH	5	6	5.2	pH		pH				
					Temperature	195	205	198	°F		Temperature				

* The printed data is incorrect. The actual data is verified on sheet 4 of this attachment.

Adds Must Be Made to Tanks Below Lower Spec Limit Before Further Use
Adds are to be made within two working days from date of request

C&A - CHECK AND ADJUST
QAR-4600B.xls
Page 3 of 5


EASTERN PLATING COMPANY, INC
QUALITY ASSURANCE RECORD

 PROCESS SOLUTION CONTROL
 CHEMICAL ADDITION REQUEST

Document #QAR-4600B:B-Report

Release Level I

Release Date: 10 March 2007

Date of Request: _____

Lab Tech: _____

Reviewed By: Willie

Sign and RETURN TO CHEMIST when complete

	TANK DATA					ACCEPTABLE RANGE		CURRENT CONDITIONS			ADD DATA			COMPLETION	
TANK	TK#	GAL. CAP.	NEW TK MU	UNITS	PARAMETER CONTROLLED	LOW	HIGH	VALUE	UNITS	O/U SPEC	CHEMICAL TO BE ADDED	ADD QTY	UNITS	OPERATOR	DATE
Chromic Anodize	B1-15	563	200	Lbs.	Free Chromic Acid	42	54	48.5	G/L		Free Chromic Acid		Lbs.		
					Total Chromic Acid		100	51.6	G/L		Total Chromic Acid				
					Temperature	90	100	94	°F		Temperature				
					Specific Gravity	1.042		1.0	Sp. Gr.		Specific Gravity				
				Gal.	Surface Tension		45	33.1			Fumetrol 140		Gal.		
Gold Chromate	B1-07	613	56	Lbs.	Iridite 14-2	1.25	2.25	1.6	Oz/Gal		Iridite 14-2		Lbs.		
					pH	1.1	1.8	1.8	pH		pH				
					Temperature	70	90	80	°F		Temperature				
Clear Chromate	B1-09	602	40	Gal	Chromicoat CLR	6	8	6.8	%V/V		Chromicoat CLR		Gal		
					pH	2.3	2.5	2.5	pH		pH				
					Temperature	75	85	75	°F		Temperature				
SurTec 650 Chrom	B1-40	123	37	Gal	Chromital TCP SurTec 650	28	32	38.5	%V/V		Chromital TCP SurTec 650		Gal		
					pH	3.8	4	4.0	pH		pH		Gal		
					Temperature	90	100	92	°F		Temperature				
Dichromate Seal	B1-15C	154	50	Lbs.	Sodium Dichromate	4.5	6	5.4	%W/V		Sodium Dichromate		Lbs.		
					pH	5	6	5.0	pH		pH				
					Temperature	195	205	not on	°F		Temperature				

Adds Must Be Made to Tanks Below Lower Spec Limit Before Further Use
 Adds are to be made within two working days from date of request

C&A - CHECK AND ADJUST
QAR-4600B.xls
 Page 3 of 5

Attachment 9f Page 4 of 4

Show Recent Messages (F3)

_Wellington Abhilashi: I called today to Maryland Department of Environment to find address and phone number for Emergency response teams. They told me that if i sant contingency plan to MDE, I don't need to send again for Emergency response teams.

Michael Castor: Thanks

_Wellington Abhilashi: Dec. 3 2007 We make 563 gal new Chromic Acid Anodize tank. Start to run some test panels in new tank. After that Dec 6 2007 we start to use new 563 gal tank as our prodution tank and stop using Old 286 gal tank. On same date pump out Good Chromic Acid solution in to drumes.

_Wellington Abhilashi: On Dec 7 2007 we clean up that Old Chromic Acid (286 gal) tank with rinse water and pumpeout that Rinse water in the drums on same date.

Michael Castor: Thanks

ENVIRO-CHEM LABORATORIES, INC.



100 Lakefront Drive, Hunt Valley, Maryland 21030

(410) 785-9739

FINAL REPORT OF ANALYSES

Eastern Plating Company
1200 South Baylis Street
Baltimore, MD 21224-
Attn Mr. Michael Caster

PROJECT NAME:
REPORT DATE: 31-Jan-08

LAB#- ECL015089-003 SAMPLE ID-Chrome Rinse SAMPLE MATRIX-water
DATE SAMPLED- 1/4/2008 TIME SAMPLED-
SAMPLER- A. Amasia SAMPLE SITE-
DATE RECEIVED- 1/7/2008 TIME RECEIVED- 12:30 RECEIVED BY-CHK

Page 3 of 12

ANALYSIS	METHOD	ANALYSIS DATE	BY	RESULT	UNITS	DET. LIMIT
Arsenic	EPA 200.7	01/15/08	CHK	< 5.000	mg/L	5.000
Barium	EPA 200.7	01/15/08	CHK	0.273	mg/L	0.200
Cadmium	EPA 200.7	01/15/08	CHK	< 0.050	mg/L	0.050
Chromium	EPA 200.7	01/15/08	CHK	9050	mg/L	50.0
Lead	EPA 200.7	01/15/08	CHK	< 0.50	mg/L	0.50
Mercury	EPA 245.1	01/08/08	CHK	< 0.010	mg/L	0.010
Selenium	EPA 200.7	01/15/08	CHK	< 0.500	mg/L	0.500
Silver	EPA 200.7	01/17/08	CHK	0.240	mg/L	0.100

Note: The high chrome amount indicates this was one of the drums used to rinse the bottom of the tank & there was residual chrome solution in the bottom of the tank.

The chromic acid process solution is maintained much higher, at a minimum of 45 g/L or 45,000 mg/L.

The rinse water reported in the accompanying report was 8.78 mg/L

ENVIRO-CHEM LABORATORIES, INC.



100 Lakefront Drive, Hunt Valley, Maryland 21030

(410) 785-9739

FINAL REPORT OF ANALYSES

Eastern Plating Company
1200 South Baylis Street
Baltimore, MD 21224-

PROJECT NAME:
REPORT DATE: 26-Feb-08

LAB#- ECL015295-001 SAMPLE ID- Tank 8 Chrome Rinse
LOCATION-
DATE SAMPLED- 2/15/2008 TIME SAMPLED- SAMPLER- A. Amasia
DATE RECEIVED- 2/19/2008 TIME RECEIVED- 14:15
DELIVERED BY- A. Amasia RECEIVED BY- SES

Page 1 of 4

ANALYSIS	METHOD	ANALYSIS DATE/TIME	BY	RESULT	DETECTION LIMIT
Arsenic	EPA 200.7	2/25/2008 11:07	CHK	< 0.030 mg/L	0.030
Barium	EPA 200.7	2/25/2008 11:07	CHK	1.111 mg/L	0.020
Cadmium	EPA 200.7	2/25/2008 11:07	CHK	< 0.005 mg/L	0.005
Chromium	EPA 200.7	2/26/2008 11:10	CHK	8.780 mg/L	0.050
Lead	EPA 200.7	2/25/2008 11:07	CHK	< 0.05 mg/L	0.05
Mercury	EPA 245.1	2/25/2008 14:47	CHK	< 0.001 mg/L	0.001
Selenium	EPA 200.7	2/25/2008 11:07	CHK	< 0.050 mg/L	0.050
Silver	EPA 200.7	2/25/2008 11:07	CHK	< 0.010 mg/L	0.010

Additional Response # 10

“...It is stated that the caustic etch drums were generated on June 20, 2007...”

- a. The caustic etch drum was generated on June 20, 2007 when 100 gallons of etch was decanted from the tank.

Attachment 10a contains Chemical Addition Request from June 19, 2007. Line 3 contains the request and the sign off that the decant was made.

Note: 2 drums were generated that day. One of the drums is the drum in question. The other drum was in the waste treatment area during the December 11, 2007 EPA inspection.

- b. The June 20, 2007 generation date provided to me was mistakenly assumed to be the same date as the decant. It was not researched into the validity nor did I question or validate it.

We have no record of adding caustic etch sludge to the drum on June 20, 2007.

Our records show that sludge was added to the drum on September 27, 2007. Our operator reported on April 21, 2008 there was already less than ½ drum of caustic sludge in the drum when he made the addition on September 27, 2007.

Lab records show a 16 gallon add to the etch tank on May 5, 2006 and a significant drop in aluminum content from the next lab analysis on May 18. From these records, it is likely the first amount of sludge identified above was generated on May 12, 2006.

Attachment 10d contains these lab records.

- c. The caustic etch is in the waste treatment area now. Several gallons have been added to the reagent tank though no records indicate that. Attachment 10b contains a photo of the drum in the waste treatment area.

The overpack with the caustic etch sludge was shipped as hazardous waste on April 3, 2008. Attachment 10c contains the manifest.

Attachment 10a

EASTERN PLATING COMPANY, INC QUALITY ASSURANCE RECORD

PROCESS SOLUTION CONTROL
CHEMICAL ADDITION REQUEST

Document #QAR-4600B:B-Report

Release Level H

Release Date: 21 November 2006

Date of Request: June 19, 2007

Lab Tech: willie

Reviewed By: _____

Sign and RETURN TO CHEMIST when complete

TANK	TANK DATA				PARAMETER CONTROLLED	ACCEPTABLE RANGE		CURRENT CONDITIONS			ADD DATA			COMPLETION	
	TK#	GAL. CAP.	NEW TK MU	UNITS		LOW	HIGH	VALUE	UNITS	O/U SPEC	CHEMICAL TO BE ADDED	ADD QTY	UNITS	OPERATOR	DATE
Soak Cleaner	B1-01	604	30	Gal	Oakite NST	8.5	12.5	12.2	%V/V		Oakite NST		Gal		
					Temperature	130	140	136	*F		Temperature				
Caustic Etch	B1-03	613	67	Gal	50% Caustic Soda	8	12	18.7	%V/V	Over	50% Caustic Soda	160	Gal	CA	06/20/07
					Sodium Aluminate		10	3.3	Oz/Gal		Sodium Aluminate				
					Temperature	95	105	100	*F		Temperature				
Alkaline Etch	B1-12A	151	15	Gal	50% Caustic Soda	8	12	11.8	%V/V		50% Caustic Soda		Gal		
					Sodium Aluminate		10	9.3	Oz/Gal		Sodium Aluminate				
					Temperature	125	140	139	*F		Temperature				
Deoxidizer	B1-05	606	110	Gal	Oakite LNC	15	25	22.1	%V/V	add	Oakite LNC	12	Gal	George	06/19/07
Satin Etch	B1-12C	116	85	Lbs.	Ammonium Bifluoride	8	12	10.8	Oz/Gal		Ammonium Bifluoride		Lbs.		
Nitric Neutralizer	B1-18	202	90	Gal	Nitric Acid	35	45	40.3	%V/V	add	Nitric Acid	5	Gal	George	06/19/07
Sulfuric Anodize	B1-11	569	60	Gal	Sulfuric Acid	175	200	186.0	G/L	add	Sulfuric Acid	1	Gal	George	06/19/07
					Aluminum		10	6.7	G/L		Aluminum				
			17	Gal	US Specialty Ano-EE	1	4	2.5	%V/V	add	US Specialty Ano-EE	6	Gal	George	06/19/07
					Temperature	68	72	72	*F		Temperature				
Anomax Hardcoat	B1-16B	519	60	Gal	Sulfuric Acid	170	190	185.0	G/L	add	Sulfuric Acid	1	Gal	George	06/19/07
					Aluminum		10	1.6	G/L		Aluminum				
			17	Gal	US Specialty Ano-EE	3	5		%V/V		US Specialty Ano-EE		Gal		
					Temperature	59/70	61/72	28	*F		Temperature				

Adds Must Be Made to Tanks Below Lower Spec Limit Before Further Use
Adds are to be made within two working days from date of request

C&A - CHECK AND ADJUST

QAR-4600B.xls

6/21/07 AM Page 1 of 5

Attachment 10b



Attachment 10c

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MD00063215453	2. Page 1 of 1	3. Emergency Response Phone (800) 362-1517	4. Manifest Tracking Number 001409858 FLE	
5. Generator's Name and Mailing Address Eastern Plating Company 1200 South Baylis Street Baltimore, MD 21224				Generator's Site Address (if different than mailing address) Attn: Wellington (410) 342-4107		
6. Transporter 1 Company Name Midwest Environmental Transport, Inc				U.S. EPA ID Number OH0000000539		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232				U.S. EPA ID Number OH0083377010		
9a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity
				No.	Type	
GENERATOR	1. HAZARDOUS WASTE SOLID N.O.S. (Chromium, Nickel) NA 3077, PGIII (D007)			6	DF	100
	2. HAZARDOUS WASTE SOLID N.O.S. (Chromium, Nickel) NA 3077, PGIII (D007)			1	DF	600
	3. HAZARDOUS WASTE LIQUID N.O.S. (NICKEL HYDROXIDE, ALUMINUM HYDROXIDE) 8 UN1760 PG I			1	DF	55
	4.					
14. Special Handling Instructions and Additional Information 1. X95257 6 x55 ERG # 171 3. X95261 1 x55 ERG # 154 2. X95260 1 x55 ERG # 154						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Wellington				Signature <i>[Signature]</i>		Month Day Year 04 03 00
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name Robert P. Wright				Signature <i>[Signature]</i>	
	Transporter 2 Printed/Typed Name				Signature	
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	18b. Alternate Facility (or Generator) U.S. EPA ID Number					
	18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name				Signature		Month Day Year



EASTERN PLATING COMPANY, INC
QUALITY ASSURANCE RECORD

PROCESS SOLUTION CONTROL
CHEMICAL ADDITION REQUEST

Document #QAR-4600B:B-Report

Release Level E

Release Date: 3 May 2006

Date of Request: 5-11-06

Lab Tech: RJB

Reviewed By: [Signature]

Sign and RETURN TO CHEMIST when complete

TANK DATA					PARAMETER CONTROLLED	ACCEPTABLE RANGE		CURRENT CONDITIONS			ADD DATA			COMPLETION	
TANK	TK#	GAL. CAP.	NEW TK MU	UNITS		LOW	HIGH	VALUE	UNITS	O/U SPEC	CHEMICAL TO BE ADDED	ADD QTY	UNITS	OPERATOR	DATE
Soak Cleaner	B1-01	604	30	Gal	Oakite NST	8.5	12.5	9.6	%V/V		Oakite NST		Gal		
Caustic Etch	B1-03	613	67	Gal	50% Caustic Soda	8	12	10.4	%V/V		50% Caustic Soda		Gal		
					Sodium Aluminate		10	3.9	Oz/Gal		Sodium Aluminate				
Alkaline Etch	B1-12A	151	15	Gal	50% Caustic Soda	8	12	10.1	%V/V		50% Caustic Soda		Gal		
					Sodium Aluminate		10	6.0	Oz/Gal		Sodium Aluminate				
Deoxidizer	B1-05	606	110	Gal	Oakite LNC	15	25	18.2	%V/V		Oakite LNC		Gal		
Satin Etch	B1-12C	116	85	Lbs.	Ammonium Bifluoride	8	12	12.1	Oz/Gal		Ammonium Bifluoride		Lbs.		
Nitric Neutralizer	B1-18	202	90	Gal	Nitric Acid	35	45	39.7	%V/V		Nitric Acid		Gal		
Sulfuric Anodize	B1-11	569	60	Gal	Sulfuric Acid	175	200	186	G/L		Sulfuric Acid		Gal		
					Aluminum	5	10	7.2	G/L		Aluminum				
			17	Gal	US Specialty Ano-EE	1	4		%V/V		US Specialty Ano-EE		Gal		
Anomax Hardcoat	B1-16B	519	60	Gal	Sulfuric Acid	170	190	177	G/L		Sulfuric Acid	4	Gal	SC	5/15
					Aluminum		10	8.8	G/L		Aluminum				
			17	Gal	US Specialty Ano-EE	3	5		%V/V		US Specialty Ano-EE		Gal		
Martin Hardcoat	B1-16C	608	60	Gal	Sulfuric Acid	160	190	174	G/L		Sulfuric Acid	4	Gal	SC	5/15
					Aluminum		3	2.9	G/L		Aluminum				
	B1-16A	613		Gal									Gal		

Adds Must Be Made to Tanks Below Lower Spec Limit Before Further Use
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C&A - CHECK AND ADJUST

Attachment 10d
Page 1 of 3

PROCESS TANK MAKEUP

Issue Date: 2006-05-11 10:34:12

Issued By: Eastern Plating

Tank Number: 7

Tank Name: B1-12A Alkaline Etch

Volume: 151 Gallons

Inv.#	Chemical Inventory Name	Required	Actual	Units
3	CAUSTIC SODA SOLUTION, 50%	15	✓	GAL
10	Oakite MG-32	1	✓	gallon

Makeup Date:

5/12/06

Makeup By:

J. F. M. S.

Operator No.: MANT



EASTERN PLATING COMPANY, INC QUALITY ASSURANCE RECORD

PROCESS SOLUTION CONTROL CHEMICAL ADDITION REQUEST

Document #QAR-4600B:B-Report

Release Level E

Release Date: 3 May 2006

Date of Request:

5/18/06

Lab Tech:

RJT

Reviewed By:

[Signature]

Sign and RETURN TO CHEMIST when complete

TANK DATA					PARAMETER CONTROLLED	ACCEPTABLE RANGE		CURRENT CONDITIONS			ADD DATA			COMPLETION	
TANK	TK#	GAL. CAP.	NEW TK MU	UNITS		LOW	HIGH	VALUE	UNITS	O/U SPEC	CHEMICAL TO BE ADDED	ADD QTY	UNITS	OPERATOR	DATE
Soak Cleaner	B1-01	604	30	Gal	Oakite NST	8.5	12.5	10.1	%V/V		Oakite NST		Gal		
Caustic Etch	B1-03	613	67	Gal	50% Caustic Soda	8	12	10.5	%V/V		50% Caustic Soda		Gal		
					Sodium Aluminate		10	4.0	Oz/Gal		Sodium Aluminate				
Alkaline Etch	B1-12A	151	15	Gal	50% Caustic Soda	8	12	11.6	%V/V		50% Caustic Soda		Gal		
					Sodium Aluminate		10	0.5	Oz/Gal		Sodium Aluminate				
Deoxidizer	B1-05	606	110	Gal	Oakite LNC	15	25	19.2	%V/V		Oakite LNC		Gal		
Satin Etch	B1-12C	116	85	Lbs.	Ammonium Bifluoride	8	12	10.1	Oz/Gal		Ammonium Bifluoride		Lbs.		
Nitric Neutralizer	B1-18	202	90	Gal	Nitric Acid	35	45	39.3	%V/V		Nitric Acid		Gal		
Sulfuric Anodize	B1-11	569	60	Gal	Sulfuric Acid	175	200	190	G/L		Sulfuric Acid		Gal		
					Aluminum	5	10	6.5	G/L		Aluminum				
			17	Gal	US Specialty Ano-EE	1	4		%V/V		US Specialty Ano-EE		Gal		
Anomax Hardcoat	B1-16B	519	60	Gal	Sulfuric Acid	170	190	174	G/L		Sulfuric Acid	5	Gal	<i>[Signature]</i>	5/22
					Aluminum		10	3.8	G/L		Aluminum				
			17	Gal	US Specialty Ano-EE	3	5	5.3	%V/V		US Specialty Ano-EE		Gal		
Martin Hardcoat	B1-16C	608	60	Gal	Sulfuric Acid	160	190	176	G/L		Sulfuric Acid	3	Gal	<i>[Signature]</i>	5/22
					Aluminum		3	3.1	G/L	Over	Aluminum	Decant			
	B1-16A	613		Gal									Gal		
												Decant			

Adds Must Be Made to Tanks Below Lower Spec Limit Before Further Use
Adds are to be made within two working days from date of request

C&A - CHECK AND ADJUST

Attachment 10d page 3 of 3

Additional Response # 11

Attachment 11a contains a copy of the manifest dated 01/14/03.

An electronic copy, which is more legible, was sent via email on 04/28/08.

Attachment 11a

Form Approved. OMB No. 2050-0039.

In case of an emergency or spill, immediately call the National Response Center at (800) 424-8802 and the MDE at (410) 631-3400. Nights and Holidays at (410) 974-3551.

COPY 8 - GENERATOR: DETACH & RETAIN THIS COPY

MDC	098936
-----	--------

Additional Response # 12

2. Several manifests....nickel acetate, nickel hydroxide
 - a. The anodic coating formed in our process is porous. A nickel acetate bath is used to seal the pores.
When a determination is made to make up a new bath, the nickel is precipitated from the solution by raising the pH to 10 and allowing the bath to sit overnight. The next morning, the solution has been separated into water and nickel hydroxide sludge. The water is pumped into our waste treatment system and the sludge is pumped into a collection drum.
 - b. Attachment 12a contains a profile of the nickel hydroxide sludge.
Note – the profile incorrectly identifies the material as corrosive. This correct data will be submitted to the hauler for modification.
 - c. Attachment 12b contains the MSDS for the nickel acetate seal. There is no MSDS for the nickel hydroxide.
 - d. The sludge was determined to be non-hazardous waste.
 - e. The sludge was determined to be non-hazardous waste when the sludge was transferred to the drum.
 - f. The sludge had been determined to be non-hazardous waste several years ago. This was verified recently by the lab report in Attachment 12c. There is no hazardous waste code identified for this material.
 - g. The original determination was based on generator knowledge. There are no hazardous substances in the process or the base material. The recent verification and lab report was based on a sample taken from the collection drum

Attachment 12a Page 2 of 2

Generator Name Eastern Plating

Waste Name Nickel Acetate Sludge

Profile # X95261 Pg. 2 of 2

D-Code	Characteristic Waste / TCLP (a blank box indicates N/A)	Actual Range	Concentration from Column (1)	Actual Range
D001	Ignitable liquids (f.p. <140 °F)		D015	Toxaphene >0.5 mg/l
	Ignitable Liquids		D016	2, 4-D >10.0 mg/l
	High TOC (>10%) NW		D017	2, 4, 5-TP Silvex >1.0 mg/l
	Low TOC (<10%) NWW		D018	Benzene >0.5 mg/l
	Reactive		D019	Carbon tetrachloride >0.5 mg/l
	Compressed Gases		D020	Chlordane >0.03 mg/l
X	D002 Corrosive (pH <2 or >12.5)		D021	Chlorobenzene >0.00 mg/l
	Acid Liquids		D022	Chloroform >6.0 mg/l
	Alkaline Liquids		D023	o-Cresol >100.0 mg/l
	Other Corrosive Liquids		D024	m-Cresol >100.0 mg/l
	D003 Reactive		D025	p-Cresol >100.0 mg/l
	Reactive Sulfides		D026	Cresol >100.0 mg/l
	Reactive Cyanides		D027	1, 4-Dichlorobenzene >7.5 mg/l
	Water Reactives		D028	1, 2-Dichloroethane >0.5 mg/l
	Explosives		D029	1, 1-Dichloroethylene >0.7 mg/l
	Other Reactives		D030	2, 4-Dinitrotoluene >0.13 mg/l
	D004 Arsenic >5.0 mg/l		D031	Heptachlor (and it's epoxide) >0.008 mg/l
	D005 Barium >100.0 mg/l		D032	Hexachlorobenzene >0.13 mg/l
	D006 Cadmium >1.0 mg/l		D033	Hexachlorobutadiene >0.5 mg/l
	Cadmium Batteries		D034	Hexachlorethane >3.0 mg/l
	D007 Chromium >5.0 mg/l		D035	Methyl ethyl ketone >100.0 mg/l
	D008 Lead >5.0 mg/l		D036	Nitrobenzene >2.0 mg/l
	Lead Acid Batteries		D037	Pentachlorophenol >0.00 mg/l
	D009 Mercury >0.2 mg/l		D038	Pyridine >5.0 mg/l
	High Mercury Organics (>260 mg / kg Total)		D039	Tetachloroethylene >0.7 mg/l
	Low Mercury Inorganics (>260 mg / kg Total)		D040	Trichloroethylene >0.5 mg/l
	Incineration Residues		D041	2, 4, 5-Trichlorophenol >100.0 mg/l
	Low Mercury (<260 mg / kg Total)		D042	2, 4, 6-Trichlorophenol >2.0 mg/l
	D010 Selenium >1.0 mg/l		D043	Vinyl Chloride >0.2 mg/l
	D011 Silver >5.0 mg/l			
	D012 Endrin >0.02 mg/l			
	D013 Lindane >0.4 mg/l			
	D014 Methoxychlor >10.0 mg/l			

If waste is D001 - D043 does it contain any of the underlying hazardous constituents listed in Table UTS 40 CFR 268.48?

☐ YES - (If "Yes" complete Question 2 below)
 ☒ NO - (If "No" complete Question 3 below)

Other Metals	Actual / Range	Other Organic Constituents (ppm)	Actual / Range	Other Inorganic Constituents	None	ppm	Actual / Range
Copper		VOCs <100 >100		Cyanide (Total)		>250	
Nickel		*PCB 0 <50 50-500 >500		Cyanide (Amendable)		>30	
Thallium		TOC <1% >1%		Sulfides		>500	
Zinc							

*PCB regulated by 40 CFR part 761? ☐ Yes ☒ No If "Yes," material must be profiled on a confidential PCB waste profile

Federal Land Disposal Restrictions & Underlying Hazardous Constituent Determination

1. Federal Land Disposal Restriction Standards: (check one and complete questions)

- ☐ Does not meet any applicable standards
☐ Treated to meet all applicable standards
☐ Meets all applicable standards without treatment
☒ Needs to be treated to meet certain treatment standards
☐ No federally mandated treatment standards apply

2. List all underlying hazardous constituents applicable to this waste at the point of generation. Refer to 40 CFR 268.48 - Table UTS

2a. ☐ This waste meets the Universal Treatment Standards for all "underlying constituents" listed above.2b. ☐ This waste does not meet the Universal Treatment Standards for the "underlying constituents" listed above and must be treated before this waste can be land disposed.3. The above information was determined by: ☒ Generator's knowledge of the waste ☐ Laboratory analysis (attached)

Benzene NESHAP Determination

Is waste generated by a chemical manufacturing plant, coke by product recovery plant, or a petroleum refinery?
 Does this waste contain benzene subject to the control requirements of 40 CFR Part 61 Subpart FF (NESHAP)?

☐ Yes ☒ No
☐ Yes ☒ No

Infectious Waste Certification

If the waste is biological, I certify that it is not infectious _____ initial

This information provided is true and correct and is based on analysis of a representative sample of the waste in accordance with EPA Guidelines Document SW-846 and EPA 600/1-800018 or my thorough knowledge of the waste.

Signature: W. H. HileyTitle: ChemistDate: 4/2/08

STONE CHEMICAL COMPANY
1555 Naperville/Wheaton Rd, Suite 114
Naperville, Illinois 60563 USA
(630) 305-0538

MATERIAL SAFETY DATA SHEET

AN545L**ANODIZING SEAL****MANUFACTURED BY:**

STONE CHEMICAL COMPANY
1555 NAPERVILLE/WHEATON RD, SUITE 114
NAPERVILLE, ILLINOIS 60563
(630) 305-0538

EFFECTIVE DATE:**JANUARY 1, 2001****CHEMICAL EMERGENCY:****1-800-535-5053 (INFOTRAC)**

SECTION I - PRODUCT INFORMATION

TRADE NAME:**STONE AN545L ANODIZING SEAL****CHEMICAL NAME****SYNONYMS:****ANODIZING SEAL****CHEMICAL FAMILY:****NICKEL ACETATE****D.O.T. IDENTIFICATION #:****NOT D.O.T. REGULATED**

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT:**PERCENT:****NICKEL ACETATE TETRAHYDRATE C.A.S. #373-02-4****<25%**

SECTION III - PHYSICAL DATA

APPEARANCE: CLEAR GREEN LIQUID**SPECIFIC GRAVITY: 1.074 @ 25°C****ODOR: MILD ACETIC ODOR****PH: 5.3-5.6****BOILING POINT: 212 DEGREES F.****VAPOR PRESSURE: N/A****EVAPORATION RATE: N/A****VAPOR DENSITY (AIR=1): N/A****PERCENT VOLATILE BY VOLUME: N/A****SOLUBILITY IN WATER: 100%**

STONE CHEMICAL COMPANY
1555 Naperville/Wheaton Rd, Suite 114
Naperville, Illinois 60563 USA
(630) 305-0538

MATERIAL SAFETY DATA SHEET
AN545L ANODIZING SEAL

SECTION IV - FIRE AND EXPLOSION DATA

FLASH POINT (METHOD USED): NONE

FLAMMABLE LIMITS **LEL:** N/A **UEL:** N/A

EXTINGUISHING MEDIA: FOR FIRES IN AREA USE APPROPRIATE MEDIA.
FOR EXAMPLE: WATER SPRAY, DRY CHEMICAL, CARBON DIOXIDE,
ALCOHOL FOAM.

SPECIAL FIRE FIGHTING PROCEDURES: WEAR PROTECTIVE CLOTHING
INCLUDING A NIOSH-APPROVED SELF-CONTAINED BREATHING APPARATUS.

UNUSUAL FIRE EXPLOSION HAZARDS: NONE

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: N/A

EFFECTS OF OVEREXPOSURE:

EYE CONTACT: CAUSES IRRITATION, POSSIBLY SEVERE.

SKIN CONTACT: MAY CAUSE IRRITATION, ESPECIALLY ON PROLONGED
CONTACT.

INHALATION: INHALATION CAUSES COUGHING AND IRRITATION OF NOSE,
THROAT, AND MUCOUS MEMBRANES.

INGESTION: MAY CAUSE NAUSEA AND VOMITING.

CHRONIC OVEREXPOSURE: MAY AGGRAVATE EXISTING SKIN, EYE, AND
LUNG CONDITIONS.

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(630) 305-0538

MATERIAL SAFETY DATA SHEET
AN545L ANODIZING SEAL

SECTION VI - FIRST AID RECOMMENDATIONS

EYES: IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES, HOLDING EYELIDS APART TO ENSURE FLUSHING OF ENTIRE SURFACE. WASHING WITHIN ONE MINUTE IS ESSENTIAL TO ACHIEVE MAXIMUM EFFECTIVENESS. SEEK MEDICAL ATTENTION.

SKIN: WASH THOROUGHLY WITH SOAP AND WATER, REMOVE CONTAMINATED CLOTHING AND FOOTWEAR. WASH CLOTHING BEFORE REUSE. GET MEDICAL ATTENTION IF IRRITATION SHOULD DEVELOP.

INGESTION: GIVE CONSCIOUS PERSON SEVERAL GLASSES OF WATER THEN INDUCE VOMITING BY TICKLING BACK OF THROAT WITH FINGER. KEEP AIRWAY CLEAR. GET MEDICAL ATTENTION. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

INHALATION: REMOVE TO FRESH AIR. IF NOT BREATHING, GIVE ARTIFICIAL RESPIRATION, PREFERABLY MOUTH-TO-MOUTH. IF BREATHING IS DIFFICULT, GIVE OXYGEN. SEEK MEDICAL ATTENTION.

SECTION VII - REACTIVITY DATA

STABILITY: X STABLE ___ UNSTABLE

CONDITIONS TO AVOID: NONE

INCOMPATIBLE MATERIALS: NONE

HAZARDOUS POLYMERIZATION: ___ WILL OCCUR X WILL NOT OCCUR

HAZARDOUS DECOMPOSITION PRODUCTS: NONE

STONE CHEMICAL COMPANY
1555 Naperville/Wheaton Rd, Suite 114
Naperville, Illinois 60563 USA
(630) 305-0538

MATERIAL SAFETY DATA SHEET
AN545L ANODIZING SEAL

SECTION VIII - SPILL OR LEAK PROCEDURES

SPILL OR LEAKAGE: MAINTAIN ADEQUATE VENTILATION. USE PROPER SAFETY EQUIPMENT. CONTAIN SPILL, PLACE INTO DRUMS FOR PROPER DISPOSAL OR REUSE. FLUSH REMAINING AREA WITH WATER TO REMOVE TRACE RESIDUE AND DISPOSE OF PROPERLY. AVOID DIRECT DISCHARGE TO SEWERS AND SURFACE WATERS.

WASTE DISPOSAL METHOD: OBSERVE ALL LOCAL, STATE, AND FEDERAL REGULATIONS. DISPOSE OF AT APPROVED LANDFILL SITE OR WASTE TREATMENT FACILITY. IF AUTHORIZED, NEUTRALIZE MATERIAL AND FLUSH TO APPROVED WASTE TREATMENT SYSTEM. DO NOT PRESSURIZE, CUT, WELD, BRAZE SOLDER, DRILL, GRIND OR EXPOSE EMPTY CONTAINERS TO HEAT, FLAME, SPARKS OR OTHER SOURCES OF IGNITION.

SECTION IX - PERSONAL PROTECTION

VENTILATION REQUIREMENTS: LOCAL EXHAUST VENTILATION

PERSONAL PROTECTIVE EQUIPMENT:

EYE PROTECTION: CHEMICAL SPLASH GOGGLES OR FACE SHIELD

SKIN PROTECTION: RUBBER OR PLASTIC GLOVES

RESPIRATORY PROTECTION: NIOSH/OSHA APPROVED RESPIRATOR IF NECESSARY. FOLLOW MANUFACTURER'S RECOMMENDATIONS

OTHER REQUIRED EQUIPMENT: EYEWASH STATION. SAFETY SHOWER. RUBBER APRON. CHEMICAL SAFETY SHOES. PROTECTIVE CLOTHING

STONE CHEMICAL COMPANY
1555 Naperville/Wheaton Rd, Suite 114
Naperville, Illinois 60563 USA
(630) 305-0538

MATERIAL SAFETY DATA SHEET
AN545L ANODIZING SEAL

SECTION X - SPECIAL PRECAUTIONS

PRECAUTIONARY STATEMENTS:

WARNING:

CAUSES IRRITATION.
AVOID CONTACT WITH EYES, SKIN, AND CLOTHING.
WEAR CHEMICAL SPLASH GOGGLES, GLOVES AND PROTECTIVE CLOTHING
WHEN HANDLING.
USE WITH ADEQUATE VENTILATION.
WASH THOROUGHLY AFTER HANDLING.
FOR INDUSTRIAL USE ONLY.

OTHER HANDLING AND STORAGE REQUIREMENTS:

STORE IN COOL DRY PLACE.
STORE IN CLOSED CONTAINERS. DO NOT STORE IN UNLABELED OR
MISLABELED CONTAINERS.

CHEMICAL EMERGENCY TELEPHONE (INFOTRAC): 1-800-535-5053

ALL INFORMATION, RECOMMENDATIONS, AND SUGGESTIONS APPEARING
HEREIN CONCERNING OUR PRODUCT ARE BASED UPON TESTS AND DATA
BELIEVED TO BE RELIABLE. HOWEVER, IT IS THE USER'S RESPONSIBILITY TO
DETERMINE THE SAFETY, TOXICITY, AND SUITABILITY FOR HIS OWN USE OF
THE PRODUCT DESCRIBED HEREIN. SINCE THE ACTUAL USE BY OTHERS IS
BEYOND OUR CONTROL, NO GUARANTEE, OR WARRANTY EXPRESSED OR
IMPLIED, IS MADE BY STONE CHEMICAL COMPANY AS TO THE EFFECTS OF
SUCH USE, THE RESULTS TO BE OBTAINED, OR THE SAFETY AND TOXICITY OF
THE PRODUCT, NOR DOES STONE CHEMICAL COMPANY ASSUME ANY
LIABILITY ARISING OUT OF USE, BY OTHERS, OF THE PRODUCT REFERRED TO
HEREIN. THE INFORMATION MAY BE NECESSARY OR DESIRABLE WHEN
PARTICULAR OR EXCEPTIONAL CONDITIONS OR CIRCUMSTANCES EXIST OR
BECAUSE OF APPLICABLE LAWS OR GOVERNMENT REGULATIONS.

STONE CHEMICAL COMPANY

1300 Iroquois Drive, Suite 135
Naperville, Illinois 60563 USA
(630) 305-0538

MATERIAL SAFETY DATA SHEET

AN590L**SEAL ADDITIVE****MANUFACTURED BY:**

STONE CHEMICAL COMPANY
1300 IROQUOIS DRIVE, SUITE 135
NAPERVILLE, ILLINOIS 60563
(630) 305-0538

EFFECTIVE DATE:**JANUARY 1, 2004****CHEMICAL EMERGENCY:****1-800-535-5053 (INFOTRAC)**

SECTION I - PRODUCT INFORMATION

TRADE NAME:**STONE AN590L SEAL ADDITIVE****CHEMICAL NAMES:****N/A****FORMULA:****PROPRIETARY****D.O.T. IDENTIFICATION #:****NOT D.O.T. REGULATED**

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT:**PERCENT****%TLV LEVEL****PEL LEVEL****NONE****N/A****N/A****N/A**

SECTION III - PHYSICAL DATA

APPEARANCE & ODOR: PALE YELLOW/BROWN LIQUID WITH MILD ODOR**SPECIFIC GRAVITY (H₂O = 1): 1.13****VAPOR PRESSURE: 17.8@20°C****BOILING POINT: 212°F****pH: 7.5 – 9.0****EVAPORATION RATE: UNKNOWN****VAPOR DENSITY (AIR=1): N/A****PERCENT VOLATILE BY VOLUME: 62%****SOLUBILITY IN WATER: 100%**

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1300 Iroquois Drive, Suite 135
Naperville, Illinois 60563 USA
(630) 305-0538

**MATERIAL SAFETY DATA SHEET
AN590L SEAL ADDITIVE**

SECTION IV - FIRE AND EXPLOSION DATA

FLASH POINT (METHOD USED): NON-FLAMMABLE WATER SOLUTION

FLAMMABLE LIMITS

LEL: N/A

UEL: N/A

EXTINGUISHING MEDIA: THE ORGANIC PORTION MAY BURN ONCE THE WATER IS EVAPORATED. IN SUCH CASE, USE WATER SPRAY (FOG), ALCOHOL-TYPE, FOAM FOR LARGE FIRES. CO₂ OR DRY CHEMICALS FOR SMALL FIRES.

SPECIAL FIRE FIGHTING PROCEDURES: WEAR POSITIVE PRESSURE SELF CONTAINED BREATHING APPARATUS. DO NOT SPRAY A SOLID STREAM OF WATER OR FOAM ON HOT BURNING LIQUID, MAY CAUSE FROTHING.

UNUSUAL FIRE EXPLOSION HAZARDS: NONE

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: NOT ESTABLISHED (OSHA 29 CFR 1910.Z-1-A)
NOT ESTABLISHED (ASGIH 1996)

EFFECTS OF OVEREXPOSURE:

EMERGENCY OVERVIEW: AN590L MAY CAUSE SKIN IRRITATION AND PERMANENT EYE INJURY. MAY CAUSE NAUSEA, DIARRHEA, AND VOMITING IF INGESTED. BREATHING THE MIST OR VAPORS MAY CAUSE CHEST DISCOMFORT, COUGHING AND IRRITATION TO THE UPPER RESPIRATORY TRACT.

EYE CONTACT: CONTACT WITH THE EYES MAY CAUSE MODERATE IRRITATION. MAY CAUSE MODERATE CORNEAL INJURY WHICH MAY RESULT IN PERMANENT IMPAIRMENT OF VISION, EVEN BLINDNESS. VAPORS OR AEROSOL MIST MAY IRRITATE THE EYES.

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(630) 305-0538

MATERIAL SAFETY DATA SHEET AN590L SEAL ADDITIVE

SKIN CONTACT: CONTACT WITH THE SKIN WILL CAUSE A GRADUAL BURNING FEELING RESULTING IN IRRITATION, REDDENING AND POSSIBLE CHEMICAL BURNS. PROLONGED AND REPEATED CONTACT WILL CAUSE DEOILING OF THE SKIN INFLAMMATION, RASHES OR DERMATITIS. MATERIAL MAY CAUSE CHEMICAL BURNS IF NOT REMOVED IMMEDIATELY.

INGESTION: SWALLOWING SMALL AMOUNTS OF MATERIAL INCIDENTAL TO NORMAL HANDLING OPERATIONS ARE NOT LIKELY TO CAUSE INJURY. SWALLOWING LARGE AMOUNTS MAY CAUSE A BURNING FEELING RESULTING IN IRRITATION, REDDING AND POSSIBLE CHEMICAL BURNS TO THE MOUTH, THROAT, AND MUCOUS MEMBRANE. MATERIAL MAY CAUSE SICKNESS AND UPSET STOMACH.

INHALATION: EXCESSIVE EXPOSURE MAY CAUSE SICKNESS, SNEEZING, OR IRRITATION TO THE NOSE, THROAT, AND LUNGS.

CHRONIC INFORMATION: MATERIAL IS NON-CARCINOGENIC. EXCESSIVE EXPOSURE MAY CAUSE LIVER AND KIDNEY EFFECTS.

SECTION VI - FIRST AID RECOMMENDATIONS

EYES: WASH EYES IMMEDIATELY WITH RUNNING WATER, INCLUDING UNDER THE EYELIDS FOR 30 MINUTES. CALL A PHYSICIAN, PREFERABLY AN OPHTHALMOLOGIST.

SKIN: WASH AREA WITH RUNNING WATER FOR 5 TO 10 MINUTES. CONTAMINATED CLOTHING SHOULD BE WASHED BEFORE REUSE.

INGESTION (SWALLOWING): GIVE SEVERAL GLASSES OF WATER. INDUCE VOMITING ONLY IF LARGE AMOUNT IS SWALLOWED. CALL A PHYSICIAN.

INHALATION (BREATHING): MOVE AWAY FROM VAPORS TO FRESH AIR SOURCE. REST UNTIL NORMAL BREATHING IS RESTORED. IF BREATHING HAS STOPPED, ADMINISTER ARTIFICIAL RESPIRATION AND OXYGEN. **SEEK MEDICAL ASSISTANCE.**

STONE CHEMICAL COMPANY

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Naperville, Illinois 60563 USA
(630) 305-0538

**MATERIAL SAFETY DATA SHEET
AN59OL SEAL ADDITIVE**

SKIN CONTACT: WASH AREA WITH RUNNING WATER FOR 5 TO 10 MINUTES.
CONTAMINATED CLOTHING SHOULD BE WASHED BEFORE REUSE.

NOTES TO PHYSICIAN: THERE IS NO SPECIFIC ANTIDOTE. TREATMENT OF
OVEREXPOSURE SHOULD BE DIRECTED AT THE CONTROL OF
SYMPTOMS AND THE CLINICAL CONDITION OF THE PATIENT. DUE TO
THE IRRITANT AND SURFACTANT ACTION OF THE MATERIAL, IF IT IS
ASPIRATED DURING SWALLOWING OR VOMITING, THERE MAY BE LUNG
INJURY. THEREFORE, EMESIS SHOULD NOT BE INDUCED BY
MECHANICAL OR PHARMACOLOGICAL MEANS. IF IT IS CONSIDERED
THAT EVACUATION OF THE STOMACH CONTENTS IS NECESSARY, THIS
SHOULD BE DONE BY MEANS LEAST LIKELY TO RESULT IN ASPIRATION
(E.G THE USE OF GASTRIC LAVAGE IN THE PRESENCE OF
ENDOTRACHEAL INTUBATION).

SECTION VII - REACTIVITY DATA

STABILITY: X STABLE UNSTABLE

CONDITIONS TO AVOID: N/A

INCOMPATIBLE MATERIALS: ALKALIS

HAZARDOUS POLYMERIZATION: WILL OCCUR X WILL NOT OCCUR

HAZARDOUS DECOMPOSITION PRODUCTS: NONE

STONE CHEMICAL COMPANY

1300 Iroquois Drive, Suite 135
Naperville, Illinois 60563 USA
(630) 305-0538

MATERIAL SAFETY DATA SHEET AN590L SEAL ADDITIVE

SECTION VIII - NFPA LABEL INFORMATION

	<u>NFPA</u>	<u>KEY</u>
HEALTH:	1	0 - MINIMAL
FLAMMABILITY:	0	1 - SLIGHT
REACTIVITY:	0	2 - MODERATE
		3 - SERIOUS
		4 - SEVERE

PERSONAL PROTECTION RATING TO BE SUPPLIED BY USER DEPENDING ON USE CONDITIONS.

HMIS = HAZARDOUS MATERIALS IDENTIFICATION SYSTEM

NFPA = NATIONAL FIRE PROTECTION ASSOCIATION 704

HEALTH, FLAMMABILITY, AND REACTIVITY RATINGS SHOULD ONLY BE USED AS A GUIDE. THE MATERIAL SAFETY DATA SHEET FOR THE PRODUCT SHOULD BE CONSULTED WHEN ASSESSING HAZARD INFORMATION.

SECTION IX - SPILL OR LEAK PROCEDURES

SPILL OR LEAKAGE: RECOVER ALL MATERIAL PRACTICAL FOR USE. SOAK UP BALANCE WITH SAND, DIRT, OR OTHER ABSORBENT AND HAUL TO AN APPROVED LANDFILL. WASH RESIDUE TO INDUSTRIAL WASTE TREATMENT WITH WATER. AVOID DIRECT DISCHARGE TO NATURAL WATERWAYS OR PUBLIC WATER SUPPLIES. HIGHLY TOXIC TO FISH!

WASTE DISPOSAL METHOD: PRODUCT IS NOT READILY BIODEGRADABLE IN WASTEWATER TREATMENT SYSTEMS AND IS HIGHLY TOXIC TO AQUATIC LIFE. PREFERRED METHOD OF DISPOSAL IS INCINERATION. OBSERVE ALL LOCAL, STATE, AND FEDERAL REGULATIONS.

STONE CHEMICAL COMPANY

1300 Iroquois Drive, Suite 135
Naperville, Illinois 60563 USA
(630) 305-0538

**MATERIAL SAFETY DATA SHEET
AN590L SEAL ADDITIVE**

SECTION X - PERSONAL PROTECTION

VENTILATION REQUIREMENTS: GENERAL MECHANICAL VENTILATION IF USED OR PROCESSED IN CONFINED AREAS.

PERSONAL PROTECTIVE EQUIPMENT:

EYE PROTECTION: FULL FACE-SHIELD, EYE FOUNTAIN AND SAFETY SHOWER NEAR WORK AREA.

SKIN PROTECTION: CHEMICAL RESISTANT GLOVES, LONG SLEEVED SHIRT, LONG TROUSERS, CHEMICAL RESISTANT BOOTS.

RESPIRATORY PROTECTION: AVOID BREATHING VAPORS AS THEY ARE IRRITATING. IF MISTS ARE PRESENT, USE A NIOSH APPROVED DUST/MIST RESPIRATOR.

OTHER REQUIRED EQUIPMENT: NONE

SECTION XI - SPECIAL PRECAUTIONS

PRECAUTIONARY STATEMENTS: MATERIAL IS SLIPPERY ON WET OR HARD SURFACES.

FOR INDUSTRIAL USE ONLY. KEEP OUT OF REACH OF CHILDREN.

OTHER HANDLING AND STORAGE REQUIREMENTS: KEEP CONTAINER CLOSED WHEN NOT IN USE. MAINTAIN PRODUCT AT 38°F OR HIGHER. PROTECT FROM LOW TEMPERATURES.

CHEMICAL EMERGENCY TELEPHONE (INFOTRAC): 1-800-535-5053

STONE CHEMICAL COMPANY

1300 Iroquois Drive, Suite 135
Naperville, Illinois 60563 USA
(630) 305-0538

MATERIAL SAFETY DATA SHEET AN590L SEAL ADDITIVE

ALL INFORMATION, RECOMMENDATIONS, AND SUGGESTIONS APPEARING HEREIN CONCERNING OUR PRODUCT ARE BASED UPON TESTS AND DATA BELIEVED TO BE RELIABLE. HOWEVER, IT IS THE USER'S RESPONSIBILITY TO DETERMINE THE SAFETY, TOXICITY, AND SUITABILITY FOR HIS OWN USE OF THE PRODUCT DESCRIBED HEREIN. SINCE THE ACTUAL USE BY OTHERS IS BEYOND OUR CONTROL, NO GUARANTEE, OR WARRANTY EXPRESSED OR IMPLIED, IS MADE BY STONE CHEMICAL COMPANY AS TO THE EFFECTS OF SUCH USE, THE RESULTS TO BE OBTAINED, OR THE SAFETY AND TOXICITY OF THE PRODUCT, NOR DOES STONE CHEMICAL COMPANY ASSUME ANY LIABILITY ARISING OUT OF USE, BY OTHERS, OF THE PRODUCT REFERRED TO HEREIN. THE INFORMATION MAY BE NECESSARY OR DESIRABLE WHEN PARTICULAR OR EXCEPTIONAL CONDITIONS OR CIRCUMSTANCES EXIST OR BECAUSE OF APPLICABLE LAWS OR GOVERNMENT REGULATIONS.

ENVIRO-CHEM
LABORATORIES, INC.

100 Lakefront Drive, Hunt Valley, Maryland 21030

(410) 785-9739

FINAL REPORT OF ANALYSES

Eastern Plating Company
1200 South Baylis Street
Baltimore, MD 21224-
Attn Mr. Michael Caster

PROJECT NAME:
REPORT DATE: 31-Jan-08

LAB#- ECL015089-006 SAMPLE ID-Nickel Sludge

SAMPLE MATRIX- solid

DATE SAMPLED- 1/4/2008

TIME SAMPLED-

SAMPLER- A. Amasia

SAMPLE SITE-

DATE RECEIVED- 1/7/2008

TIME RECEIVED- 12:30

RECEIVED BY-CHK

Page 6 of 12

ANALYSIS	METHOD	ANALYSIS DATE	BY	RESULT	UNITS	DET. LIMIT
TCLP Extraction	EPA 1311	01/07/08	AAA			
Arsenic in TCLP Extract	EPA 6010	01/15/08	CHK	< 0.050	mg/L	0.050
Barium in TCLP Extract	EPA 6010	01/15/08	CHK	0.069	mg/L	0.020
Cadmium in TCLP Extract	EPA 6010	01/15/08	CHK	< 0.005	mg/L	0.005
Chromium in TCLP Extrac	EPA 6010	01/15/08	CHK	0.249	mg/L	0.010
Lead in TCLP Extract	EPA 6010	01/15/08	CHK	< 0.050	mg/L	0.050
Mercury in TCLP Extract	EPA 7470	01/08/08	CHK	< 0.001	mg/L	0.001
Selenium in TCLP Extrac	EPA 6010	01/15/08	CHK	< 0.050	mg/L	0.050
Silver in TCLP Extract	EPA 6010	01/17/08	CHK	< 0.010	mg/L	0.010

Additional Response # 13

Please state when these plans have been submitted to the police departments, fire departments, hospitals, and state and local emergency response teams, and provide the basis of your knowledge.

The plan was distributed to the agencies specified above in April 2002 when Revision E was created. At that time we had a consultant working with us who prepared the plan. He had reported to me the plan had been sent. The consultant was credible and I believe return receipts were generated but I have not searched the records to locate the receipts. Likewise, the plan may have been sent afterwards.

When preparing for the original responses, I ordered the plan to be distributed to the above agencies.

Attachment 13a contains the dated Certified Mail Receipts and copies of the emails sent in 2008.

For: Pulaski Highway.

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	\$1.31	0032
Certified Fee		\$2.65	09
Return Receipt Fee (Endorsement Required)		\$2.15	
Restricted Delivery Fee (Endorsement Required)		\$0.00	
Total Postage & Fees	\$	\$6.11	03/24/2008

Postmark
Here
4 2008

Sent To Rosedale Volunteer Fire Station
Street, Apt. No., or PO Box No. 8031 Philadelphia Road
Rosedale
City, State, ZIP+4 Baltimore MD 21237

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	\$1.31	0032
Certified Fee		\$2.65	09
Return Receipt Fee (Endorsement Required)		\$2.15	
Restricted Delivery Fee (Endorsement Required)		\$0.00	
Total Postage & Fees	\$	\$6.11	03/24/2008

Postmark
Here
4 2008

Sent To Southeast Police District
Street, Apt. No., or PO Box No. 5200 Eastern Ave.
City, State, ZIP+4 Baltimore MD 21224

PS Form 3800, August 2006 See Reverse for Instructions

For: Baylis street.

For: Baylis street.

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	\$1.31	0032
Certified Fee		\$2.65	09
Return Receipt Fee (Endorsement Required)		\$2.15	
Restricted Delivery Fee (Endorsement Required)		\$0.00	
Total Postage & Fees	\$	\$6.11	03/24/2008

Postmark
Here
4 2008

Sent To Baltimore city fire Dept
Street, Apt. No., or PO Box No. 520 South Conklin street
City, State, ZIP+4 Baltimore MD 21224

PS Form 3800, August 2006 See Reverse for Instructions

7006 2760 0000 3942 4237

7006 2760 0000 3942 4220

contingency plan

SENDER: COMPLETE THIS SECTION

1. Article Addressed to: Rosedale Volunteer Fire Station
8031 Philadelphia Road
Baltimore MD 21237

2. Service Type
☒ Certified Mail
☐ Registered Mail
☐ Return Receipt for Merchandise
☐ Insured Mail
☐ Registered Mail (over \$500)

3. Delivery address different from item 1? ☐ Yes ☒ No

4. Delivery address different from item 1? ☐ Yes ☒ No

5. Signature of Addressee [Signature]

6. Signature of Sender [Signature]

7. Date of Delivery 03/25/08

8. Date of Receipt 03/25/08

9. Signature of Addressee [Signature]

10. Signature of Sender [Signature]

11. Date of Delivery 03/25/08

12. Date of Receipt 03/25/08

13. Signature of Addressee [Signature]

14. Signature of Sender [Signature]

15. Date of Delivery 03/25/08

16. Date of Receipt 03/25/08

17. Signature of Addressee [Signature]

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22. Signature of Sender [Signature]

23. Date of Delivery 03/25/08

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26. Signature of Sender [Signature]

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65. Signature of Addressee [Signature]

66. Signature of Sender [Signature]

67. Date of Delivery 03/25/08

68. Date of Receipt 03/25/08

69. Signature of Addressee [Signature]

70. Signature of Sender [Signature]

71. Date of Delivery 03/25/08

72. Date of Receipt 03/25/08

73. Signature of Addressee [Signature]

74. Signature of Sender [Signature]

75. Date of Delivery 03/25/08

76. Date of Receipt 03/25/08

77. Signature of Addressee [Signature]

78. Signature of Sender [Signature]

79. Date of Delivery 03/25/08

80. Date of Receipt 03/25/08

81. Signature of Addressee [Signature]

82. Signature of Sender [Signature]

83. Date of Delivery 03/25/08

84. Date of Receipt 03/25/08

85. Signature of Addressee [Signature]

86. Signature of Sender [Signature]

87. Date of Delivery 03/25/08

88. Date of Receipt 03/25/08

89. Signature of Addressee [Signature]

90. Signature of Sender [Signature]

91. Date of Delivery 03/25/08

92. Date of Receipt 03/25/08

93. Signature of Addressee [Signature]

94. Signature of Sender [Signature]

95. Date of Delivery 03/25/08

96. Date of Receipt 03/25/08

97. Signature of Addressee [Signature]

98. Signature of Sender [Signature]

99. Date of Delivery 03/25/08

100. Date of Receipt 03/25/08

Attach ment
13a
page 1 of 3

Attachment
13a
page 2 of 5

For: Baylis Street And.
Pulaski Highway.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

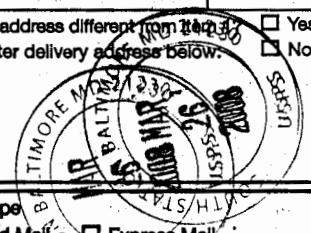
1. Article Addressed to:
Maryland Dep. of Environment
Hazardous & Solid Waste
Administration
1800 Washington Blvd.
Suite 645
BALTIMORE.
MD 21230-1719

2. Article Number
(Transfer from service label) 7006 2760 0000 3942 4213

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee
X [Signature]
B. Received by (Printed Name)
C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:
3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes



For: Baylis Street And.
Pulaski Highway.

**U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com®
OFFICIAL USE

Postage	\$ 1.20
Certified Fee	\$ 2.95
Return Receipt Fee (Endorsement Required)	\$ 0.00
Restricted Delivery Fee (Endorsement Required)	\$ 0.00
Total Postage & Fees	\$ 4.15

Sent to Maryland Dept. of Environment
Hazardous & Solid Waste Administration
Street, Apt. No., or PO Box No. 1800 Washington Blvd. Suite 645
City, State, ZIP+4 Baltimore MD 21230-1719
PS Form 3800, August 2005 See Reverse for Instructions

6124 246E 0000 0922 9002

Contingency Plan

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Baltimore Co. Police Dept.
White marsh precinct
8220 Perry hall Blvd
BALTIMORE.
MD 21236

2. Article Number
(Transfer from service label) 7007 0710 0004 6002 5218

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent ☐ Addressee
X [Signature]
B. Received by (Printed Name) X Baltimore
C. Date of Delivery 3/25/08
D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:
3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

For: Pulaski Highway.

**U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com®
OFFICIAL USE

Postage	\$ 1.20
Certified Fee	\$ 2.95
Return Receipt Fee (Endorsement Required)	\$ 0.00
Restricted Delivery Fee (Endorsement Required)	\$ 0.00
Total Postage & Fees	\$ 4.15

Sent to Baltimore Co. Police Dept.
White marsh precinct
Street, Apt. No., or PO Box No. 8220 Perry hall Blvd
City, State, ZIP+4 Baltimore MD 21236
PS Form 3800, August 2005 See Reverse for Instructions

8125 2009 4000 0120 2002

To: Bayview Hospital. Attachment

From: Wellington Abhilashi (ep_labs@yahoo.com)

To: sbostic1@jhmi.edu

Date: Tuesday, March 18, 2008 2:28:43 PM

Subject: Eastern Plating Co., Inc. - Baltimore, MD - Contingency Plan

13a
page 3 of 4

To whom it may concern:

Attached please find Eastern Plating Co., Inc.'s Baylis St. facility Contingency Plan. Please handle this as necessary. If you have any questions, feel free to contact me by responding to this email or at 410.342.4107.

Regards,

Wellington Abhilashi
Facility Chemist

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

TO:- Bayview Hospital.

Attachment
13a
page 4 of 5

From: Wellington Abhilashi (ep_labs@yahoo.com)

To: sbostic1@jhmi.edu

Date: Monday, April 28, 2008 1:44:34 PM

Cc: Mike Castor

Subject: Fw: Eastern Plating Co., Inc. Pulaski Highway MD-Contingency Plan

----- Forwarded Message -----

From: Wellington Abhilashi <ep_labs@yahoo.com>

To: sbostic <1@jhmi.edu>

Cc: Mike Castor <easternplating@yahoo.com>

Sent: Monday, April 28, 2008 1:17:54 PM

Subject: Eastern Plating Co., Inc. Pulaski Highway MD-Contingency Plan

To whom it may concern:

Attached please find Eastern Plating Co., Inc.'s Pulaski Highway facility Contingency Plan. Please handle this as necessary. If you have any questions, feel free to contact me by responding to this email or at 410-342-4107.

Regards,

Wellington Abhilashi
Facility Chemist

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Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

Show Recent Messages (F3)

_Wellington Abhilashi: I called today to Maryland Department of Environment to find address and phone number for Emergency response teams. They told me that if i sant contingency plan to MDE, I don't need to send again for Emergency response teams.

Michael Castor: Thanks

_Wellington Abhilashi: Dec. 3 2007 We make 563 gal new Chromic Acid Anodize tank. Start to run some test panels in new tank. After that Dec 6 2007 we start to use new 563 gal tank as our prodution tank and stop using Old 286 gal tank. On same date pump out Good Chromic Acid solution in to drumes.

_Wellington Abhilashi: On Dec 7 2007 we clean up that Old Chromic Acid (286 gal) tank with rinse water and pumpeout that Rinse water in the drums on same date.

Michael Castor: Thanks

Additional Response # 14

14. Please send copy of the production chemist job description.

Attachment 14a contains the job description for the Production Chemist.

Note – The hazardous waste responsibility and authority is included in the “EPA compliance” responsibility listed in the job description summary. It is not specifically stated.

The responsibility has been a consistent duty for many years. This is evidenced, in part, by Attachment 3a where the chemist was the key contact for the MDE August 2004.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS
PRODUCTION CHEMIST**

JOB DESCRIPTION:

This position covers the broad function of managing the technical support at Eastern Plating. The primary responsibility is managing the plant chemistry of the anodizing and plating baths. Other areas of responsibility include OSHA compliance, EPA compliance, worker safety management, R & D and computer support.

This is a full time position.

The Production Chemist reports to the Technical Director.

DUTIES:

Plant Chemist

- Manage plant laboratory, including development and maintenance of procedures
- Responsible for maintaining anodizing and plating baths
- Manage product testing (Monthly Test Panels, Solution Analysis, and Water Monitoring)
- Coordinate product testing with outside laboratories
- Maintains Calibration Recall System for Company's Measuring Equipment
- Trouble shoot process problems
- Search and implement new chemistries for the process baths
- Assist with administering employee training on anodizing and related disciplines
- Assist with hosting customer quality audits

Regulatory Responsibilities

- Manage wastewater treatment system
- Insure compliance with EPA wastewater discharge permit
- Coordinate compliance sampling with outside vendors
- Complete periodic EPA reports

Workplace Safety

- Administer OSHA required safety training
- Maintain safety program

Computer Support

- Provide support for Windows 2000 LAN and XP work stations
- Coordinate with outside vendors for hardware and software support
- Install new hardware
- Install new software

Experience:

Bachelors of Science in Chemistry or related experience
Must have prior experience in an industrial laboratory

Additional Response # 15

The titles of the named individuals are below:

Gerald Sullivan – Customer Service Manager
Karen Keffer – Customer Service Manager
Espinoza, Jose – Production Coordinator
Michael Shimer – Lead Maintenance Operator
Amy McGee – Customer Service Representative
Justin Wright – Line Operator
Amy Witt – Customer Service Representative
Brandon Humphreys - Racker
Stanley Boswell – Line Operator
Frank Leach – Plant Manager
Rolanda Morris – Expediter

Attachments 15a – h contain job descriptions for the positions identified above.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

CUSTOMER SERVICE MANAGER

Overall responsible for insuring that customers' needs are met.

- **Customer Communications**
Responsible for customer communications and procedures
 - Customers are informed about their job
 - Advanced notices using phone calls or faxes.
 - Responding to customer calls immediately
 - Phone calls are answered before the machine picks up
 - Phones are covered at all times
 - Customers get quick responses to their questions
 - Customers get accurate answers about the status of their jobs
 - Customers are informed of problems as soon as possible.
 - Supporting equipment meets our needs
 - Phone, fax and E-mail systems all allows us to communicate with our customers in the best way.
 - Phones are in the best possible locations.
 - Phones have the most effective features for communicating with our customers.
 - Constantly improving communications with our customers using hardware, software, personnel, new ideas and new methods.
- **Shipping and Receiving**
Responsible for ensuring that drivers and carriers receive the fastest, most efficient service possible.
 - Shipping and Receiving System
 - Driver drop offs and pick ups are quick
 - Finished work shelves are organized
 - Tickets are with finished work
 - Receiving work is organized
 - Order entry - Ensures jobs are entered into the system in accurately and timely.
- **Expediting**
Ensures jobs are scheduled to meet customer requests. Ensures jobs are run to meet the schedule. Communicates with customers on delivery needs and status.
- **Quoting**
Provides price estimates to customers.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

PRODUCTION COORDINATOR

JOB DESCRIPTION

The individual in this position has the primary responsibility of moving product through the shop to satisfy customer demand while optimizing production resources. This is a hands on leadership position.

The Production Coordinator heads up the process teams and reports to the Plant Manager.

This is a full time, 40 hour per week job with overtime available.

DUTIES

JOB PLANNING AND EXECUTION

- Plans daily load schedules for racking, unracking, maskers and line operators based on the daily customer requirements schedule.
- Responsible for planning load sequences to attain the highest throughput of work while satisfying customer demand.
- Allocates production resources to meet the daily schedules. Production resources include process teams, process tanks and racks.
- Assures jobs are processed to meet the schedule.
- Assists teams, when necessary, with processing work, including racking, unracking, masking and line operation.

QUALITY AND SAFETY

- Assures job paperwork is properly maintained
- Trains production personnel on work habits and company workmanship standards.
- Assures production personnel follow company workmanship standards.
- Assures Quality Standards are maintained.
- Makes Level 2 decisions for accepting and rejecting work.
- Assures production personnel practice safe working habits in accordance with company policy.
- Interfaces with the expeditor to plan jobs and communicate status of jobs.

PROCESS CONTROL AND DEVELOPMENT

- Assures work orders are accurate. Notifies Process Planner of any changes needed on work orders and parts specifications.
- Interfaces with Plant Chemist on status of production baths.
- Searches for new ways to increase productivity. Responsible for improving production methods, including new racking/unracking methods, masking methods, processing methods, shop layout.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

JOB SKILLS

Understands aluminum anodizing process
Understands racking, unracking and masking processes.
Works well with other people
Able to learn quickly
Willing to learn
Good at taking instructions
Good organizational skills
Good listening skills
Proven leadership skills
Demonstrated ability to work with computerized production systems, including move tickets and hold tickets

EXPERIENCE

Prior experience in a leadership position in a manufacturing or assembly environment.
Experience with plating or anodizing aluminum preferred, but not required.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

LEAD MAINTENANCE TECHNICIAN

JOB DESCRIPTION

The individual in this position is responsible for ensuring all equipment and facilities are maintained in top working condition. The Lead Maintenance Technician is a generalist position. The individual is responsible for preventive maintenance and trouble shooting electrical, refrigeration, rectifier, HVAC, waste treatment equipment and building maintenance. The Lead Maintenance Technician will interface with outside contractors in these areas. Other responsibilities include Process Bath Maintenance (chemical additions and emptying chemicals from baths) and assembling anodize racks to support production.

This is a full time, 40 hour per week job with overtime available.

This position reports to the Maintenance Supervisor.

DUTIES:

- Preventive maintenance on all equipment, including pumps, motors, rectifiers, waste treatment equipment and safety equipment. Measuring cycle times, heat readings, amp and voltage readings and oil levels will be included in the preventive maintenance.
- Fill out maintenance log on activities performed on each apparatus
- Troubleshoot electrical, telecommunications and computer hardware equipment problems
- Change lighting fixtures, ballasts and bulbs
- Change motors, pumps, circuit boards
- Disassemble pumps and motors for bench checking
- Troubleshoot plumbing problems
- Make periodic additions to processing baths
- Manage decants and dumps of processing baths
- Run wire and conduit
- Assemble and disassemble processing racks

JOB SKILLS

- Must have prior experience with maintenance in a manufacturing environment
- Must have experience with electrical testing equipment
- Must demonstrate basic understanding of pumps and motors
- Must demonstrate basic understanding of plumbing
- Must demonstrate basic understanding of carpentry
- Must demonstrate basic understanding of refrigeration
- Must demonstrate good safety habits

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

CSR - CUSTOMER SERVICE REPRESENTATIVE

JOB DESCRIPTION

The individual in this position is the customer's primary contact person. The CSR's number one responsibility is to make sure the customer receives all jobs on the committed date and at the committed time. The CSR is responsible for shipping and receiving, job scheduling, informing and responding to customer inquiries regarding job status and availability.

This is a full time, 40 hour per week job with overtime available.

The CSR reports to the Customer Service Manager.

DUTIES:

Customer Service - Job Scheduling

- Ensures customer's jobs are properly received.
- Ensures customer's receiving their jobs on the committed date and at the committed time.
- Coordinates with Customer Service Manager and Production Coordinator on commitment dates for customer jobs
- Assign due dates to jobs
- Communicates to customers the due dates
- Follows up with Production Coordinator status of commitments

Customer Service - Communication

- Assures that customers are notified of due dates
- Assures that customers receive jobs as committed
- Responds to customer inquiries regarding job status
- Coordinates with customers drop off and pickup of jobs
- Monitors delivery performance of jobs
- Monitors customer satisfaction
- Maintains customer complaint system

Shipping and Receiving - Assures the following is being done

- Prepare Shipping Tickets
- File Shipping Tickets for Jobs
- Receive boxes containing customer orders/sign shipping documents
- Move customer's work to proper location
- Create Work Order from customer's shipping document
- Fax order status notification to customers
- Respond to customer inquiries about order status

JOB SKILLS:

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

Must possess the following skills

- Expediting skills
- Computerized Order Entry skills
- Good organizational skills
- Good interpersonal skills
- Good telephone skills
- Work well with other people
- Able to listen and take instructions.
- Willing to learn
- Data entry computer skills
- Able to handle concurrent multiple tasks
- Lifting and carrying packages is part of this job

EXPERIENCE

Prior experience in shipping and receiving and/or expediting in a manufacturing or distribution environment are required.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

LINE OPERATOR

- Processes work through the tanks
- Insures work is racked suitably for processing through the line
- Follows Jobcard work instructions, including immersion times and tank sequences
- Performs in-process inspections including water break, Qtip, no parts missing on the racks
- Monitors conditions of the tanks including temperature, agitation, solution levels, rectifier output
- Insures work is ready for the next stage of processing

All Line Operators report to the Team Leader for their process.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

RACKER

JOB DESCRIPTION:

Responsible for assembling aluminum parts on to metal racks. Racker removes metal parts from boxes, inspects parts, counts parts and assembles parts on to racks. After each rack has been assembled, racker records the count on to a work ticket. Assembled racks are then moved by a line operator for processing.

Racker reports to the Racking Team Leader.

DUTIES

- Inspects incoming parts
- Racks parts
- Obtains orders from Racking Team Leader
- Counts parts on the racks
- Records counts
- Reports problems with jobs - count & condition

JOB SKILLS:

- Must work well with other people
- Must be able to listen and take instructions.
- Must be willing to learn
- Must have good counting skills
- Must be able to write neatly and legibly
- Must be good working with their hands
- Must have good eyesight for inspections

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS
PLANT MANAGER**

JOB DESCRIPTION

Reporting to the General Manager, the Plant Manager heads up all production and production related functions including Job Planning, Production Coordination and Facilities Management. This position is responsible for developing and maintaining all production related operations in an optimal manner to meet customer demand. This position is responsible for supervision of over 20 workers and multiple shifts. The Plant Manager provides operations management support to the satellite location and interfaces with Customer Service, Quality and Lab personnel.

DUTIES

SUPERVISION

The Plant Manager is responsible for plant personnel, including employee development, disciplinary actions and adherence to company policies. Ensures that processing personnel are trained to the highest level to meet the demands of the process.

PROCESS MANAGEMENT

Ensures all production processes are operating efficiently to produce the highest output of acceptable product. Acts as Lead Technical Advisor for all processes.
Develops new production systems which increase output and reduce cost.

RESOURCE PLANNING

Responsible for coordinating personnel, facilities, processes and all other production resources to satisfy customer demand and insure the highest production output.

JOB PLANNING/SCHEDULING

Responsible for preparing work instructions which include the most efficient processing methods for jobs, including racking, masking, chemical processing, unracking and packing.
Responsible for moving the most amount of work through each production load while maintaining product quality.
Responsible for scheduling load sequences to attain the highest throughput of work while satisfying customer quality and schedule demands.

FACILITIES MANAGEMENT

Ensures facilities are operating in optimal condition to support production. Responsible for facilities organization and housekeeping.

SKILLS/EXPERIENCE

Demonstrated leadership skills: Results oriented, self-motivated, works well with people.
Shop Floor Leadership skills: Able to optimize production output.
Methodical problem solver.
Basic Understanding of Metal Finishing, Chemistry and Metallurgy.
Skilled with reading part drawings and using drawings to design part fixturing.
Minimum of 5 years supervisory experience.
Technical or college training is preferred.
Bilingual Spanish is preferred.

**EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS**

EXPEDITER

JOB DESCRIPTION

The individual in this position is the customer's primary contact person. The Expediter's number one responsibility is to make sure all jobs are received by the customer on the committed date and at the committed time. The Expediter is responsible for heading up shipping and receiving, job scheduling, informing and responding to customer inquiries regarding job status and availability.

This is a full time, 40 hour per week job with overtime available.

The Expediter reports to the Customer Service Manager.

DUTIES:

Customer Service - Job Scheduling

- Ensures customers receive their jobs on the committed date and at the committed time.
- Coordinates with Customer Service Manager and Production Coordinator on commitment dates for customer jobs
- Assign due dates to jobs
- Communicates to customers the due dates
- Follows up with Production Coordinator status of commitments

Customer Service - Communication

- Assures that customers are notified of due dates
- Assures that customers receive jobs as committed
- Responds to customer inquiries regarding job status
- Coordinates with customers drop off and pickup of jobs
- Monitors delivery performance of jobs
- Monitors customer satisfaction
- Maintains customer complaint system

Shipping and Receiving

- Prepare Shipping Tickets
- File Shipping Tickets for Jobs
- Receive boxes containing customer orders/sign shipping documents
- Move customer's work to proper location
- Create Work Order from customer's shipping document
- Receive Purchased Goods
- File Shipping Tickets for Received Goods
- Fax order status notification to customers
- Respond to customer inquiries about order status

EASTERN PLATING COMPANY, INC.
JOB DESCRIPTIONS

JOB SKILLS:

Must possess the following skills

- Expediting skills
- Computerized Order Entry skills
- Good organizational skills
- Good interpersonal skills
- Good telephone skills
- Work well with other people
- Able to listen and take instructions.
- Willing to learn
- Data entry computer skills
- Able to handle concurrent multiple tasks
- Lifting and carrying packages is part of this job

EXPERIENCE

Prior experience in shipping and receiving and/or expediting in a manufacturing or distribution environment is required.

Additional Response # 16

“...it is stated that inspections of hazardous waste storage area were performed weekly at both facilities...”

- a. The inspections took place by either the Chemists or their assistants, as follows:

Chemists:

Melvin Pollard reported to me at least once per month that he had performed weekly hazardous waste inspections.

Hugh McAdams may not have performed weekly hazardous waste inspections.

Rich Panek reported to me at least once per month that he had performed weekly hazardous waste inspections.

Wellington Abhilashi may not have performed weekly inspections.

Assistants:

Maintenance operators report to the Chemist. They are the “assistants” in our Response to Question 22 of the February 4, 2008 Information Request.

Every Friday at 3:30 we have an all personnel shop cleanup. Maintenance operators are assigned to cleanup and inspect all chemical and waste storage areas though we have no cleanup procedure to support this.

Notes: Our stored waste is limited (3-7 drums) and narrow in scope (dirty MEK and, occasionally chromic acid/rinse). Our facilities are small and hazardous waste storage locations are located in or close to the working areas where maintenance operators and process operators are continuously working.

All of our personnel have been trained to observe their workplace and report any damage to any assets or leaks from any containers. Inspecting areas such as hazardous waste containers are a default responsibility of our operators.

When responding to Question 22 of the February 4, 2008 Information Request, I was well aware that our Hazardous Waste Inspection did not meet the requirements of Large Quantity Generators. I understood that it was very likely that my response would be questioned. I was also sure, though, that the stored hazardous waste was being monitored and inspected, at least once per week by the maintenance operators (and frequently by the process operators), to the extent that any damage to the containers, leaks from the containers or unauthorized access would be immediately report to the Chemist who would, in turn, immediately report the incident to me or my Assistant General Manager (no job description available).

- b. The Production Chemist is responsible for conducting weekly inspections of the hazardous waste storage areas in both facilities.

Wellington Abilashi is currently our Production Chemist.